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Attorneys for Defendants NATIONSTAR MORTGAGE, LLC,
XOME SETTLEMENT SERVICES LLC, AND QUANTARIUM, LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

COLLATERAL ANALYTICS, LLC,

Plaintiff,

v.

NATIONSTAR MORTGAGE LLC,
XOME SETTLEMENT SERVICES LLC, and
QUANTARIUM, LLC,

Defendants.

Case No. 3:18-cv-00019-RS

**THE PARTIES' STIPULATION AND
[PROPOSED] ORDER REGARDING
DISCOVERY OF EMAILS AND
ATTACHMENTS**

Ctrm: 3, 17th Floor
Judge: Honorable Richard Seeborg

Pursuant to the Court's minute order following the initial case management conference held in this case on April 19, 2018, ECF No. 53, Plaintiff Collateral Analytics, LLC and Defendants Nationstar Mortgage LLC, Xome Settlement Services, LLC, and Quantarium, LLC (together, the "Parties") held a further meet and confer regarding discovery of emails and their attachments. The Parties respectfully submit the following protocol to limit the discovery of emails and their attachments in this case:

1. Within twenty-one (21) days from the service of a request for production ("RFP") for emails and their attachments, the Parties shall meet and confer to develop a list of custodians and search terms that the Responding Party will use to search for, review, and produce any emails and attachments responsive to the RFP.

2. At least seven (7) days before the meet and confer the Propounding Party shall serve a proposed list of custodians and search terms for each of the Propounding Party's RFPs that requests emails and their attachments.

3. At the meet and confer, the Responding Party shall be prepared to discuss the number of emails that contain each of the search terms by custodian (*i.e.*, the hit counts) identified in the Propounding Party's proposed list. The Parties agree to negotiate the list of search terms and custodians in good faith, taking into account the hit counts for the search terms and custodians and the subject matter of the RFP.

4. Nothing in this protocol shall be interpreted to require disclosure of irrelevant information or relevant information protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege or immunity. The Parties do not waive any objections as to the production, discoverability, admissibility, or confidentiality of emails and their attachments, and reserve all rights to seek appropriate relief from the Court.

Dated: April 27, 2018

DURIE TANGRI LLP

By: /s/ Lauren E. Kapsky
LAUREN E. KAPSKY

Attorney for Plaintiff
COLLATERAL ANALYTICS, LLC

1 Dated: April 27, 2018

MCKOOL SMITH, P.C.

2
3 By: /s/ Ashley Moore
ASHLEY MOORE

4 Attorney for Defendants NATIONSTAR
5 MORTGAGE, LLC, XOME SETTLEMENT
SERVICES LLC, AND QUANTARIUM, LLC

6 **FILER'S ATTESTATION**

7 Pursuant to Civil L.R. 5-1(i)(3), regarding signatures, I, Lauren E. Kapsky, attest that concurrence
8 in the filing of this document has been obtained.

9 Dated: April 27, 2018

/s/ Lauren E. Kapsky
LAUREN E. KAPSKY

10
11 **[PROPOSED] ORDER**

12 PURSUANT TO STIPULATION, IT IS SO ORDERED.

13 Dated: _____

14 RICHARD SEEBORG
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on April 27, 2018 the within document was filed with the Clerk of the Court using CM/ECF which will send notification of such filing to the attorneys of record in this case.

/s/ Lauren E. Kapsky
LAUREN E. KAPSKY